



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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January 22, 2008

Ref: 8EPR-N

Keith Rigtrup
Bureau of Land Management
Kanab Field Office RMP Comments
318 East 100 North
Kanab, Utah 84741

RE: Draft Resource Management Plan and
Environmental Impact Statement for the Kanab
Field Office CEQ#: 20070419

Dear Mr. Rigtrup:

Consistent with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 Office of the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Kanab Field Office.

EPA is particularly interested in the cumulative impacts from all reasonably foreseeable development, air quality impact analysis including protection of visibility in the Grand Staircase-Escalante National Monument, habitat impact analysis particularly from invasive non-native species, and consideration of mitigation measures for all resources that might be improved by curtailing surface disturbance activities during severe drought.

Alternative C is clearly the environmentally preferable alternative as the DEIS has so clearly pointed out in Table 2-2. It proposes to add protective management prescriptions for 89,790 acres of non-WSA (Wilderness Study Areas) lands with wilderness characteristics in ten areas. These include closing these areas to mineral leasing and off-highway vehicles, excluding rights-of-way, and protecting undisturbed landscapes and opportunities for primitive and semi-primitive recreation opportunities. We believe BLM should reconsider Alternative C as the preferred alternative for the 60,600 acres identified as Areas of Critical Environmental Concern (ACEC) located within non-WSA lands with wilderness characteristics in order to enhance protection of indigenous vegetation; cultural, paleontological, and historic resources; scenic and ecological values; wildlife; and other important resources. More specifically, this level of protection is needed in areas where significant environmental impacts are occurring or are likely to occur from coal development, off-highway vehicle use, and other surface disturbing activities. These areas include the Cottonwood Canyon, Water Canyon, South Fork Indian Canyon, and Parunuweap Canyon ACECs.

We also believe these management prescriptions can complement protection of State-designated “high quality waters” equivalent to the protection afforded to National Resource Waters. These segments include the North Fork of the Virgin River, the East Fork of the Virgin River, the East Fork of the Sevier River, and Kanab Creek and its tributaries. These prescriptions are particularly important for restoring and protecting valuable riparian systems and wetlands along these segments that are: 1) not in proper functioning condition; 2) particularly vulnerable to grazing and other impacts; or 3) located next to steep slopes or in erodible or sensitive (e.g., saline) soils.

EPA has a responsibility to evaluate the potential environmental impacts associated with this Draft RMP/EIS. We are rating this Proposed Action and Preferred Alternative (B) as “EC-2” under EPA’s rating criteria, which are enclosed. The “EC” rating means that our review identified several environmental impacts that should be avoided to fully protect the environment (Environmental Concerns, or “EC”). The EC rating is based on EPA’s concerns regarding the potential impacts to aquatic resources, water quality, air quality, sensitive/rare wildlife, soil erosion, recreational resources and experiences, and wildlife habitats.

The “2” rating means that the Draft RMP/EIS has insufficient information to thoroughly assess environmental impacts. Quantitative estimates of future conditions, or relative differences in qualitative estimates of those conditions showing change over time would be helpful to understand the impacts to air quality, wildlife habitats, vegetation, water quality, and other environmental resources. Because fugitive dust emissions could approach the National Ambient Air Quality Standards for particulate matter, additional information on an air quality baseline for fugitive dust should be provided in the Final RMP. We request a copy of the emissions CD mentioned on page 4-7, section 4.2.1, so that we may examine more carefully the emission factor assumptions and calculations for oil and gas field activities.

If you would like to discuss these comments, or any other issues related to our review of the Draft RMP/EIS, please contact James Hanley at 303-312-6725, or by email at hanley.james@epa.gov.

Sincerely,

/s/ Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosures